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Interim Lead Class Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO
ALL ACTIONS

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

I, Joseph R. Saveri, declare:

1. I am an attorney licensed in the State of California and admitted to practice in the Northern District of California. I am the founder of the Joseph Saveri Law Firm, Inc. ("JSLF"). I serve as Interim Lead Class Counsel for the Direct Purchaser Plaintiffs in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

2. This declaration is made in support of Direct Purchaser Plaintiffs' Administrative Motion to Seal Direct Purchaser Plaintiffs' Opposition to the Motions to Dismiss by Defendants AVX

1 Corporation, Fujitsu Limited, Hitachi America and the Holy Stone Defendants (“Opposition Brief”)
 2 and the Declaration of Andrew M. Purdy and its exhibits (“Purdy Declaration”).

3 3. The basis for sealing the identified portions of the Opposition Brief and the Purdy
 4 Declaration is that certain Defendants designated documents referenced or relied upon in the
 5 Opposition and the Purdy Declaration as “Confidential” or “Highly Confidential” under the
 6 Protective Order.

7 4. The Protective Order in this matter (Dkt. No. 563), which was agreed to by Plaintiffs,
 8 requires that documents designated “Confidential” or “Highly Confidential” be filed under seal.

9 5. Pursuant to Civ. L.R. 79-5(e), Plaintiffs identify all of the portions of Amended
 10 Complaint they seek to seal.

11 6. Attached hereto as **Exhibit 1** is a chart identifying the paragraphs of the Opposition Brief
 12 and the Purdy Declaration that Plaintiffs seek to file under seal.

13 7. With respect to each section so identified, Plaintiffs take no position on whether the
 14 material is “privileged, protectable as a trade secret or otherwise entitled to protection under law”
 15 pursuant to Civ. L.R. 79-5 or on whether the strong presumption of access to judicial records may be
 16 rebutted under the good cause or compelling reasons standards.

17 6. Plaintiffs take no position on whether the Administrative Motion should be granted.

18 I declare under penalty of perjury under the laws of the United States and the State of California
 19 that the foregoing is true and correct and to the best of my knowledge and that this declaration was
 20 executed in San Francisco, California on August 17, 2015.

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 22 By: /s/ Joseph R. Saveri
 23 Joseph R. Saveri
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